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January 28, 2020

Magistrate Judge Steven M. Gold
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Gursewak Singh v Lintech Electric Inc., et al
United States District Court EDNY 18 CV5780

Dear Magistrate Gold:

The plaintiff is submitting this letter to respond to the opposition submitted by defendants concerning plaintiff's pending motion.

It was only after the January 15, 2020 conference was held that defendants later that day "found" checks and provided them to the plaintiff.

Defendants have a habit of finding documents, backing and filling, as they go. All done after the deadline imposed by the Court in June.

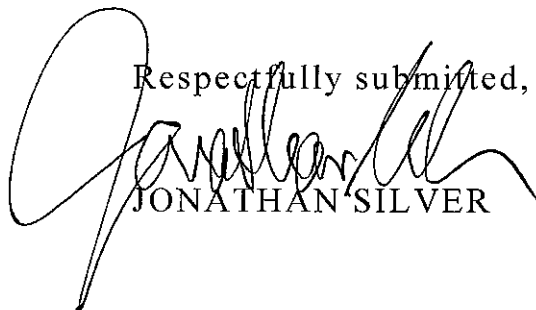
Counsel does not deny that plaintiff received those checks for the first time 13 days ago. There is no explanation given why it was done prior to the conference that day. That would appear to be an attempt to interfere with effective discovery by plaintiff.

Defendants' tactic seems to be to only send "found" documents after depositions are conducted and expects that plaintiff should be required to submit to further deposition but that

defendants, who are in control of the documents but not provided them for many months, should not be required to do the same.

Plaintiff's application, designated his First motion, should be granted.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jonathan Silver', is written over the typed name. The signature is fluid and cursive, with a large initial 'J' and a long, sweeping underline.

JONATHAN SILVER

JS/eb